

FILED

2/4/2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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Donald Ragland

JAN 05 2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 14-VCV-04584
(To be supplied by the Clerk of this Court)

Lansing Police Department,

City of Lansing

Michael Lajewski

Sgt. Frederickson

Robert Garcia

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)



COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)



OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

A. Name: Donald Bagland

B. List all aliases: _____

C. Prisoner identification number: K55918

D. Place of present confinement: STATE Ville Corrections

E. Address: JOLIET IL, 60434

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

A. Defendant: Robert Garcia
Title: Police Officer
Place of Employment: Lansing Police Department

B. Defendant: Michael Lgrowski
Title: TAC Officer
Place of Employment: Lansing Police Department

C. Defendant: Sgt. Frederickson
Title: Sergeant
Place of Employment: Lansing P.D

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number: N/A

B. Approximate date of filing lawsuit: N/A

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

D. List all defendants: N/A

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____

F. Name of judge to whom case was assigned: _____

G. Basic claim made: N/A

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 4-17-14 Officer Michael Lazowski
Violated my Constitutional rights by
Illegal Search and Siezure Plaintiff
Vehicle without Search warrant. And
Mr. Lazowski begin to harrass Plaintiff
by saying all types of racial Slurrs to
Plaintiff and illegally searching Plaintiff
by push their finger's in and out of the
Plaintiff anal, sexually assaulting me. Officer
Lazowski Violated my 8th and 14th amendment.

Darrell Koyfman

On 4-17-14 Sgt Frederickson and his
K-9 partner. Violated my Constitutional
rights by Illegal Searching my Vehicle
With out proper cause or Search warrant.

Darrell Koyfman

On 4-17-14 O

On 4-17-14 Officer Robert Garcia and
Violated by taken my constitutional right's
by ta' strip searching at Lansing Police
Department

On 4-17-14 Officer Robert Garcia
Violated my Constitutional right's by strip
Searching plaintiff at Lansing Police
Department. Ask mr. Garcia ask Plaintiff
take off all his clothe's and bend
Over and Show mr. Garcia and Officer
Laczowski his future. Meaning his
Anal hole. Than ask Plaintiff turn
around hold up his growing and ask why
your ~~thighs~~^{thighs} not moving. Plaintiff told Officer
Garcia about his Health problems and Plaintiff
needed medical. Mr. Garcia take Plaintiff
to markham lockup to be hold for Court. Court.
Markham refuse to hold Plaintiff. Due to
fact Plaintiff needed Medical attention. So
Markham told Mr. Garcia bring Plaintiff back
8:30 AM for Court. So Mr. Garcia took Plaintiff
back to Lansing Police Department without
Medical attention. ⁵ that Violated Plaintiff 8th and
14th Amendment. To be free from cruel and
unusual punishment.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

My goal is to make sure that this won't happen to know one else and to be compensated for my pain and suffering

Thank you!

VI. The plaintiff demands that the case be tried by a jury. YES NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 10 day of July, 20 15

Donald Rayland
(Signature of plaintiff or plaintiffs)

Donald Rayland
(Print name)

K55918
(I.D. Number)

Chicago, IL, 60643
12231 S. Loomis
(Address)